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Mr. William T Cross
Federal Communications Commission
Washington, D.C. 20554

92-136

RECEIVED

NOV 17 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr Cross:

In your interview with The W5YI Report you noted that WWV time signals were not included in the Prohibited transmissions proposal or in the League proposal but that if someone asked that they be included it could be reconsidered. In my comments to the FCC on this matter I specifically requested that you consider including government time broadcasts. I believe that that could be a very useful service to the amateur community. The ability of a VHF\UHF repeater providing a rebroadcast of WWV, upon demand, would be valuable. Many repeaters now have a time transmission of one kind or another, but WWV time could provide synchronization of events at remote points that would be much more difficult if not impossible by usual means.

Please consider this possibility as I believe that it could prove useful, and like other retransmission of government broadcasts, it should not cause damage to the amateur service.

Thank you for your consideration.

Cordially,



Rolland D. Cummings
WA0EDA

cc: My original comments to this docket.

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List A B C D E

21 September, 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Notice of Proposed Rule Making)
on "No-Business Rule in the)
Amateur Radio Service)

PR Docket No. 92-136

COMMENTS

1. I am an active Amateur Radio Operator currently utilizing the VHF/UHF spectrum exclusively. I am Vice President of the Pittsburg Repeater Organization. I am a member of the Kansas Amateur Repeater Council and was the first Kansas Frequency Coordinator. The comments included herein are my own personal comments.
2. I am pleased that the "No-Business" rule is to be revised. While the Amateur Radio Community does an excellent record of self-regulation, it must have a basis in federal regulation from which to react. The long-standing Absolutely no business of-any-kind has been much too limiting.
3. WITH RESPECT TO PUBLIC SERVICE: The current regulations probably prohibit a good deal of the Public Service work that is currently done. While the rules are usually not enforced, this work is for the public good and should be legitimized.
4. WITH RESPECT TO THE REMOVAL OF THE OUTRIGHT BAR ON COMMUNICATIONS THAT COULD FACILITATE THE BUSINESS OF ANY PARTY: This could be a very good change. It would permit the Amateur Service to use its communication ability to assist travelers with motel and restaurant reservations. This could encourage travelers to take breaks from their driving that would put more rested drivers on the road. It would also ease the mind of a stranded motorist, who needs to call a wrecker but does not know if this "emergency" necessitates the use of Amateur Radio.
5. WITH RESPECT TO THE TRANSMISSION OF MESSAGES FOR DIRECT OR INDIRECT MATERIAL COMPENSATION: It is very good that you are proposing to retain and in fact, strengthen the language prohibiting the use of amateur radio in ones employment. It needs to be made clear that the use of the Amateur Radio spectrum is not to be any part of an Amateur's employment.
6. WITH RESPECT TO THE TRANSMISSION OF MUSIC: I agree that music should not be permitted. However, musical tones have a place in automatic control such as repeater controllers and perhaps some provision for very limited musical bursts could be devised.

7. WITH RESPECT TO BROADCASTING OR RETRANSMISSION: The extended transmission of services such as a local weather radar or Space Shuttle transmissions are indeed a public service and a very useful part of the Amateur Service and should be permitted and encouraged. These could be viewed as 'broadcasting' but should be explicitly allowed.

The proposed rule 97.113e mentions propagation, weather forecast, and shuttle government broadcasts. It does not mention time broadcasts. The retransmission of time broadcasts should be included in this list. While the time retransmitted will not have the precision of the original broadcast, it will be a much more accurate source of time than is available to the community in any other form. Please consider adding government time broadcasts to the permitted services. Also, with regard to this paragraph, it appears to be unclear as to permission. It seems to state that permission must be obtained from NASA for any of the government retransmissions.

The proposed rule also states that these transmissions must be for the exclusive use of amateur operators. This appears to preclude their use in education etc. This appears to attempt to regulate the reception of amateur transmissions.

9. SUMMARY: I applaud your efforts to deregulate another portion of the Amateur Service. Please continue to do so, by regulating only that which is necessary to permit self-regulation. The current rules and regulations encourage the growth of the state-of-the-art to a much greater extent than they did just a few years ago. Also note that some degree of regulation and enforcement is necessary and appropriate. Please continue to support the Amateur Radio Service.

Thank you for the opportunity to express my views in this matter.

Very truly yours,

Rolland D. Cummings
Amateur Radio WAØEDA